



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

August 19, 2013

Kate Klein, Forest Supervisor
Paulina Ranger District
Ochoco National Forest
3160 NE Third Street
Prineville, Oregon 97754

Re: EPA Region 10 Comments on the Forest Service Draft Environmental Impact Statement for the Fox Canyon Cluster Allotment Management Plans on the Paulina Ranger District (EPA Project Ref: 13-0003-AFS).

Dear Ms. Klein:

The U.S. Environmental Protection Agency has reviewed the U.S. Forest Service Draft Environmental Impact Statement for the proposed Allotment Management Plans for the Antler, Brush Creek, Fox Canyon, and Gray Prairie Allotments on the Paulina Ranger District of the Ochoco National Forest in Oregon. Our review was conducted in accordance with the EPA responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act. Section 309 specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions.

The DEIS analyzes three alternatives related to the reauthorization of grazing permits on three grazing allotments on the Ochoco National Forest. The alternatives are Alternative 1 (No Action), Alternative 2 (Proposed Action), and Alternative 3 (Current Management). Alternative 2, which has been identified as the Preferred Alternative, would reauthorize grazing on all three allotments with a variety of changes to current management, including requirements for active management of livestock, new upland water developments, riparian restoration, aspen enhancement and stocking reductions.

The EPA supports Alternative 2 as the preferred alternative and we encourage the Forest to adopt Alternative 2 in its entirety. We believe Alternative 2 most closely aligns with the goals objectives of the Ochoco National Forest Land and Resource Management Plan. In particular, we support the proposed measures that would actively restore riparian condition, reduce stocking, and reduce cattle presence in riparian areas. As noted on page 96 of the DEIS, fair to poor stream shade, poor riparian vegetation, and accelerated erosion rates are common across much of the analysis area. These are conditions are largely a result of historic grazing and logging practices. We believe the measures proposed under Alternative 2 would address these issues and result in overall improvements to water quality and riparian habitat.

Based on our analysis, we are issuing a rating of LO (Lack of Objection) to the Draft EIS. An explanation of this rating is attached. We applaud the Forest for undertaking the current project in order to achieve and/or maintain consistency with the standards in the Ochoco LRMP. If you have questions about our comments, please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or you may contact Teresa Kubo of my staff at (503) 326-2859 or by electronic mail at kubo.teresa@epa.gov.

Sincerely,

A handwritten signature in blue ink, reading "Christine B. Reichgott". The signature is fluid and cursive, with the first name "Christine" and last name "Reichgott" clearly legible.

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

Enclosures

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.